

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Bankruptcy No. 21-41171
Chapter 7

In Re:)	
)	
Natalia Rose Nevin,)	
)	NOTICE OF HEARING AND MOTION OF
Debtor)	DEBTOR TO WAIVE DISCHARGE
)	
)	
)	

TO: Randall Seaver, Chapter 7 Trustee, The U.S. Trustee, all creditors, and any other entities as specified in Local Rule 9013-3.

1. The debtor through her attorney Nathan Hansen moves the Court for the relief requested below and gives notice of hearing.
2. The court will hold a hearing on this motion on July 20, 2021 at 1:30 p.m., before United States Bankruptcy Judge Kesha Tanabe. This hearing will be held telephonically. Please contact Judge Tanabe's courtroom deputy by email at mnb_tanabe_hearings@mnb.uscourts.gov or by telephone at 651-848-1051 to obtain the telephonic information.
3. Any response to this motion must be filed and served by delivery no later than July 15, 2022, which is five days before the set time for the hearing. UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY, FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

4. This court has jurisdiction over this motion pursuant to 28 U.S.C. Section 157, and Section 727, Bankruptcy Rule 4004, and Local Rule 1070-1. This proceeding is a core proceeding. The petition commencing this Chapter 7 case was filed on 6/29/2021 and the case is now pending in this court.
5. This motion is filed under 11 U.S.C. Section 727(a) (10) Bankruptcy Rules 4004(c) (1) (C), and 4001 and Local Rules 9013-1 – 9013-3. Movant requests relief in the form of the Court's order approving the debtor's waiver of discharge in this case.
6. After this case was commenced, the US Trustee investigated the debtors' financial affairs. The US Trustee concluded that an objection to the debtors' discharge pursuant to 11 U.S.C. Section 727(a) was warranted. The debtor has discussed with her attorney the issues involved with an adversary proceeding and the consequences of waiving her discharge. After discussions with counsel, the debtor has agreed to the entry of a waiver of discharge pursuant to 11 U.S.C. Section 727(a) (10).
7. The debtor denies any wrongdoing, but she understands that the court may view things differently. She wants to avoid the costs and the tribulation of further adversary litigation.

WHEREFORE, the debtor requests an order of the Court approving debtor's waiver of discharge in this case under 11 U.S.C. Section 727(a) (10).

Dated: July 3, 2022

/e/ Nathan M. Hansen

Nathan M. Hansen
Attorney for Debtor
2440 North Charles Street, Suite 242
North St. Paul, MN 55109
651-704-9600
651-704-9604 (fax)
MN Attorney Reg. No. 0328017

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Bankruptcy No. 22-04025
Chapter 7

In Re:

Natalia Rose Nevin,

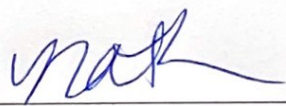
Debtor

)
)
)
) WRITTEN WAIVER OF DEBTOR IN
) SUPPORT OF MOTION OF DEBTOR TO
) WAIVE DISCHARGE
)
)
)

- 1) The debtor submits this writing in accordance with the provisions of 11 U.S.C. § 727 a (10).
- 2) The debtor has had sufficient time to discuss this matter with her attorney and requests that her discharge be waived.

WHEREFORE, the debtor requests an order of the Court approving debtor's waiver of discharge in this case under 11 U.S.C. Section 727(a) (10).

Dated: 7/6/2022



Natalia Rose Nevin
Debtor

APPROVED:

Dated: _____

Kesha Tanabe
US Bankruptcy Court Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Bankruptcy No. 21-41171
Chapter 7

In Re:)	
)	
Natalia Rose Nevin,)	
)	MEMORANDUM OF FACT AND LAW IN
Debtor)	SUPPORT OF MOTION TO WAIVE
)	DISCHARGE
)	
)	
)	

Debtor, Natalia Rose Nevin submits this Memorandum of Fact and Law in support of her Motion for Waiver of Discharge.

FACTS

The debtor filed the petition commencing this Chapter 7 case on 6/29/2021. She seeks an order from the Court approving a waiver of discharge in this case under 11 U.S.C. Section 727(a) (10) in order to avoid the tribulation and expense of an adversary proceeding. The US Trustee has brought an adversary proceeding to deny debtor a discharge.

ARGUMENT

11 U.S.C. Section 727(a) (10) provides the Court may approve a written waiver of discharge executed by the debtor after the order for relief under this chapter. This Chapter 7 case was commenced on 6/29/2021. Now through this motion debtor seeks approval from this Court for waiver of discharge in this case. Debtor has been advised by counsel of the consequences of a waiver of discharge and, though she maintains no wrong doing, she wishes to avoid the tribulation and

expense of an adversary proceeding. Therefore, the court should approve this waiver of discharge.

Dated: July 3, 2022

/e/ Nathan M. Hansen
Nathan M. Hansen
Attorney for Debtor
2440 North Charles Street, Suite 242
North St. Paul, MN 55109
651-704-9600
651-704-9604 (fax)
MN Attorney Reg. No. 0328017

I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 7/6/2022

Natalia
Natalia Rose Nevin
Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Chapter 7
Bankruptcy No. 21-41171

In Re:)	
)	
Natalia Rose Nevin,)	
)	
Debtor,)	UNSWORN CERTIFICATE OF SERVICE
)	
)	
)	
)	

The undersigned certifies that on July 7, 2022, I served Debtor's Motion to Waive Discharge, Memorandum of Law and Fact, and Waiver of Discharge (proposed) as follows:

US Trustee (via CM/ECF)

Randall Seaver
Chapter 7 Trustee
(via CM/ECF)

All entities that requested notice or filed a notice of appearance (via CM/ECF)

Dated: July 7, 2022

/e/ Nathan M. Hansen
Nathan M. Hansen
Attorney for the Debtor
2440 Charles Street North, Ste 242
North St. Paul, MN 55109
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651-704-9600
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